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6 **UNITED STATES DISTRICT COURT**  
7 **WESTERN DISTRICT OF WASHINGTON**  
8 **AT SEATTLE**

9 \_\_\_\_\_ ) Case No.: 2:20-cv-1058  
10 **BILLY WATENPAUGH,** ) **COMPLAINT;**  
11 Plaintiff, ) FAIR DEBT COLLECTION PRACTICES  
12 ) ACT (15 U.S.C. § 1692a, *et seq.*);  
13 vs. ) DEMAND FOR JURY TRIAL  
14 **RENTON COLLECTIONS, INC.,** )  
15 Defendant. )  
16 \_\_\_\_\_ )

17 **I. INTRODUCTION**

18 1. This is an action for damages brought by an individual consumer for Defendant's  
19 violations of the federal Fair Debt Collection Practices Act, 15 U.S.C. § 1692, *et seq.* (hereinafter  
20 "FDCPA").  
21

22 **II. JURISDICTION**

23 2. Plaintiff's claim for violations of the FDCPA arises under 15 U.S.C. § 1692k(d),  
24 and therefore involves a "federal question" pursuant to 28 U.S.C. § 1331.  
25

26 **III. PARTIES**

27 3. Plaintiff, Billy Watenpaugh ("Plaintiff"), is a natural person residing in King  
28 County, Washington.

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1           4. Defendant, Renton Collections, Inc. (“Defendant”), is a corporation engaged in the  
2 business of collecting debts by use of the mails and telephone. Defendant regularly attempts to  
3 collect debts alleged due another.

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5                                   **IV. FACTUAL ALLEGATIONS**

6           5. Defendant is a “debt collector” as defined by the FDCPA, 15 U.S.C. § 1692a(6).

7           6. Plaintiff is a “consumer” as defined by the FDCPA, 15 U.S.C. § 1692a(3).

8           7. All activities of Defendant set out herein were undertaken in connection with the  
9 collection of a “debt,” as defined by 15 U.S.C. § 1692a(5).  
10

11           8. Within the last year, Defendant took multiple actions in an attempt to collect a debt  
12 from Plaintiff. Defendant’s conduct violated the FDCPA in multiple ways, including the following.

13           9. Failing to note Plaintiff’s debt as having been disputed when reporting to his credit  
14 report, after Plaintiff disputed the debt over the phone (15 USC 1692e(8)).  
15

16           10. As a result of the aforementioned violations, Plaintiff suffered and continues to  
17 suffer injuries to Plaintiff’s feelings, personal humiliation, embarrassment, mental anguish and  
18 severe emotional distress.

19           11. Defendant intended to cause, by means of the actions detailed above, injuries to  
20 Plaintiff’s feelings, personal humiliation, embarrassment, mental anguish and severe emotional  
21 distress.  
22

23           12. Defendant’s actions, detailed above, were undertaken with extraordinary disregard  
24 of, or indifference to, known or highly probable risks to purported debtors.

25           13. To the extent Defendant’s actions, detailed in paragraphs above, were carried out  
26 by an employee of Defendant, that employee was acting within the scope of his or her employment.  
27

28                                   **COUNT I: VIOLATION OF FAIR DEBT COLLECTION PRACTICES ACT**

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1 14. Plaintiff reincorporates by reference all of the preceding paragraphs.

2 15. The preceding paragraphs state a *prima facie* case for Plaintiff and against  
3 Defendant for violations of the FDCPA.  
4

5 **PRAYER FOR RELIEF**

6 WHEREFORE, Plaintiff respectfully prays that judgment be entered against the Defendant  
7 for the following:

- 8 A. Declaratory judgment that Defendant's conduct violated the FDCPA;  
9  
10 B. Actual damages pursuant to 15 U.S.C. 1692k;  
11  
12 C. Statutory damages pursuant to 15 U.S.C. § 1692k;  
13  
14 D. Costs, disbursements and reasonable attorney's fees for all successful claims, and  
15 any unsuccessful claims arising out of the same transaction or occurrence as the successful claims,  
16 pursuant to 15 U.S.C. § 1692k; and,  
17  
18 E. For such other and further relief as may be just and proper.

19 **PLAINTIFF HEREBY REQUESTS A TRIAL BY JURY**

20 Dated this 9<sup>th</sup> day of July, 2020

21  
22 By: s/Joshua Trigsted  
23 Joshua Trigsted, WSBA#42917  
24 Attorney for Plaintiff  
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